

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: NATIONAL FOOTBALL
LEAGUE PLAYERS' CONCUSSION
INJURY LITIGATION

No. 12-md-2323 (AB)

MDL No. 2323

THIS DOCUMENT RELATES TO:

Plaintiffs' Master Administrative Long-
Form Complaint and:

Michael Ball, Jr., et al. v. National Football
League, et al. (Plaintiff Michael Ball, Jr.
ONLY)

Court File No. 2:13-cv-03891-AB

**MOTION FOR LEAVE TO
WITHDRAW AS COUNSEL
FOR PLAINTIFF MICHAEL
BALL, JR.**

J. Gordon Rudd, Jr., Brian C. Gudmundson, and Michael J. Laird of Zimmerman Reed LLP ("Plaintiffs' Counsel"), move this Court pursuant to Pennsylvania Rule of Professional Conduct 1.16(b)(1) and United States District Court for the Eastern District of Pennsylvania Local Rule of Civil Procedure 5.1(c) to withdraw as counsel in relation to the claims of Michael Ball, Jr. only in this action, and state as follows:

1. Plaintiff's counsel filed the action *Michael Ball, Jr., et al. v. National Football League, et al.*, No. 13-CIV-3707, in the Southern District of New York on May 31, 2013, for the benefit of several retired National Football League players, including Michael Ball, Jr.

2. Plaintiff's counsel filed a short form complaint for Michael Ball, Jr. on July 25, 2013.

3. Despite the efforts of the undersigned on Plaintiff's behalf, the NFL Concussion Settlement Claims Administrator informed Zimmerman Reed LLP that Plaintiff retained separate counsel to represent him in this case.

4. Specifically, the Claims Administrator advised Zimmerman Reed LLP, that Plaintiff informed the Claims Administrator that he was represented by a different lawyer, and listing Corboy & Demetrio as the "New Lawyer Requested by Settlement Class Member".

5. Under the circumstances, it is apparent that Michael Ball, Jr. has hired separate counsel to represent him, that those counsel have been identified to the Claims Administrator, and that the undersigned must move the Court for leave to withdraw as counsel.

WHEREFORE, Plaintiff's counsel respectfully requests this Court for leave to withdraw as counsel for Michael Ball, Jr. only in Court File No. 2:13-cv-03891-AB.

Dated: February 10, 2023

Respectfully submitted,

ZIMMERMAN REED LLP

s/ Brian C. Gudmundson

J. Gordon Rudd, Jr. (#222082)

Brian C. Gudmundson (#336695)

Michael J. Laird (#0398436)

1100 IDS Center, 80 South 8th Street

Minneapolis, MN 55402

Telephone: (612) 341-0400

Facsimile: (612) 341-0844

Gordon.Rudd@zimmreed.com

Brian.Gudmundson@zimmreed.com

Michael.Laird@zimmreed.com